

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES LTD, d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO. 7:20-CV-00947-JD

**DEFENDANT MG FREESITES'
ANSWER TO FOURTH AMENDED
COMPLAINT**

COMES NOW, MG Freesites Ltd (“MG Freesites” or “Defendant”), a Defendant in the above captioned matter, responds to Plaintiffs’ allegations in their Fourth Amended Complaint (ECF No. 99) as follows:

INTRODUCTION

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1, and on that basis denies each and every allegation.
2. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2, and on that basis denies each and every allegation.
3. Defendant denies the allegations of paragraph 3. Defendant further states it is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 that relate to Defendant Hammy Media Ltd., and additionally denies those allegations on that basis.
4. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4, and on that basis denies each and every allegation.

5. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5, and on that basis denies each and every allegation.

6. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 6, and on that basis denies each and every allegation.

7. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7, and on that basis denies each and every allegation.

8. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8, and on that basis denies each and every allegation.

9. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9, and on that basis denies each and every allegation.

10. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 10, and on that basis denies each and every allegation.

11. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 11, and on that basis denies each and every allegation.

12. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 12, and on that basis denies each and every allegation.

13. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 13, and on that basis denies each and every allegation.

14. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 14, and on that basis denies each and every allegation.

15. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 15, and on that basis denies each and every allegation.

16. Defendant admits it is a Cyprus company with a registered office located at Block 1, Dali Industrial Area, 195-197 Old Road Nicosia-Limassol Dali, 2540 Cyprus. Defendant denies that Pornhub.com is a “d/b/a” of Defendant.

17. Defendant denies the allegations within paragraph 17.

18. Defendant admits that it has received communications from third parties requesting that material be taken down from the pornhub.com website for various reasons. Defendant denies each and every remaining allegation within paragraph 18.

19. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 19, and on that basis denies each and every allegation.

20. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 20, and on that basis denies each and every allegation.

21. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 21, and on that basis denies each and every allegation.

22. Paragraph 22 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 22 to the extent such allegation pertains to Defendant. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 22 that pertain exclusively to Defendant Hammy Media, Ltd.

23. Paragraph 23 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 23. Defendant is additionally without knowledge or information sufficient to form a belief as to the truth of the allegation that this matter is between citizens of different States, and on that basis

denies such allegation.

24. Paragraph 24 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 24. Defendant is additionally without knowledge or information sufficient to form a belief as to the truth of the allegation that relevant events occurred in Gaffney, South Carolina, and on that basis denies such allegation.

FACTS

(As to Defendant Limestone and Defendant Murphy)

25. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 24, inclusive, of this Complaint, as though fully set forth herein.

26. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 26, and on that basis denies each and every allegation.

27. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 27, and on that basis denies each and every allegation.

28. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 28, and on that basis denies each and every allegation.

29. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 29, and on that basis denies each and every allegation.

30. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 30, and on that basis denies each and every allegation.

31. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 31, and on that basis denies each and every allegation.

32. Defendant is without knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 32, and on that basis denies each and every allegation.

33. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 33, and on that basis denies each and every allegation.

34. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 34, and on that basis denies each and every allegation.

35. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 35, and on that basis denies each and every allegation.

36. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 36, and on that basis denies each and every allegation.

37. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 37, and on that basis denies each and every allegation.

38. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 38, and on that basis denies each and every allegation.

39. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 39, and on that basis denies each and every allegation.

40. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 40, and on that basis denies each and every allegation. Defendant additionally denies the allegations in paragraph 40 on the basis that typographical errors in the paragraph obscure its plain meaning and do not permit a response.

41. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 41, and on that basis denies each and every allegation.

42. Defendant is without knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 42, and on that basis denies each and every allegation.

43. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 43, and on that basis denies each and every allegation.

44. Paragraph 44 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 44 because Defendant is additionally without knowledge or information sufficient to form a belief as to the truth of the allegations.

FACTS

(As to Defendant Pornhub and Defendant xHamster)

45. To the extent that the allegations of paragraph 45 pertain to Defendant, Defendant denies such allegations. To the extent that the allegations of paragraph 45 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

46. The allegations within paragraph 46 are too vague to permit a response, including that the allegation is overly broad and conclusory, and Defendant denies each and every allegation on that basis.

47. Defendant denies each and every allegation within paragraph 47.

48. Defendant denies each and every allegation within paragraph 48.

49. Defendant denies each and every allegation within paragraph 49.

50. The allegations within paragraph 50 are too vague to permit a response, including because the Complaint does not define or identify the “practice” or the “women” referenced therein. Defendant denies each and every allegation on that basis.

51. To the extent that the allegations of paragraph 51 pertain to Defendant, Defendant

denies such allegations. To the extent that the allegations of paragraph 51 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

52. This paragraph contains legal arguments that do not require a response. To the extent that the allegations of paragraph 52 pertain to Defendant, Defendant denies such allegations. To the extent that the allegations of paragraph 52 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

53. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 53, and on that basis denies each and every such allegation.

54. To the extent that the allegations of paragraph 54 pertain to Defendant, Defendant denies such allegations. To the extent that the allegations of paragraph 54 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

55. To the extent that the allegations of paragraph 55 pertain to Defendant, Defendant denies such allegations. To the extent that the allegations of paragraph 55 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

56. To the extent that the allegations of paragraph 56 pertain to Defendant, Defendant denies such allegations. To the extent that the allegations of paragraph 56 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a

belief as to the truth of such allegations, and on that basis denies each and every such allegation.

57. To the extent that the allegations of paragraph 57 pertain to Defendant, Defendant denies such allegations. To the extent that the allegations of paragraph 57 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

58. Paragraph 58 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of Paragraph 58 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 58 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

59. To the extent that the allegations of paragraph 59 pertain to Defendant, Defendant denies such allegations. To the extent that the allegations of paragraph 59 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

FOR A FIRST CAUSE OF ACTION AGAINST DEFENDANTS
(Invasion of Privacy – Wrongful Intrusion upon Private Affairs)

60. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 59, inclusive, of this Complaint, as though fully set forth herein.

61. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 61, and on that basis denies each and every allegation.

62. This paragraph contains legal arguments that do not require a response, including

legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 62, and on that basis denies each and every allegation.

63. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 63, and on that basis denies each and every allegation.

64. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 64, and on that basis denies each and every allegation.

65. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 65, and on that basis denies each and every allegation.

66. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 66 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 66 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

67. This paragraph contains legal arguments that do not require a response, including

legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations contained in Paragraph 67.

68. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 68 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 68 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

69. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 69 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 69 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

FOR A SECOND CAUSE OF ACTION AGAINST DEFENDANTS
(Invasion of Privacy – Wrongful Publicizing of Private Affairs)

70. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 70, inclusive, of this Complaint, as though fully set forth herein.

71. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 71 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 71 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a

belief as to the truth of such allegations, and on that basis denies each and every such allegation.

72. Defendant denies the allegations in paragraph 72 on the basis that typographical errors in the paragraph obscure its plain meaning and do not permit a response.

73. Defendant denies the allegations in paragraph 73 on the basis that typographical errors in the paragraph obscure its plain meaning and do not permit a response.

74. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 74 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 74 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

75. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 75, and on that basis denies each and every allegation.

76. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 76 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 76 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

77. This paragraph contains legal arguments that do not require a response, including

legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 77 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 77 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

78. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 78 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 78 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

FOR A THIRD CAUSE OF ACTION AGAINST DEFENDANTS
(Invasion of Privacy – Wrongful Appropriation of Personality)

79. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 78, inclusive, of this Complaint, as though fully set forth herein.

80. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 80 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 80 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

81. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent

a response is required, Defendant denies the allegations of paragraph 81 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 81 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

82. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 82 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 82 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

83. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 83, and on that basis denies each and every allegation.

84. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 84 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 84 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

85. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent

a response is required, Defendant denies the allegations of paragraph 85 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 85 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

86. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Invasion of Privacy claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 86 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 86 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

FOR A FOURTH CAUSE OF ACTION AGAINST DEFENDANTS
(Intentional Infliction of Emotional Distress)

87. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 86, inclusive, of this Complaint, as though fully set forth herein.

88. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Intentional Infliction of Emotional Distress claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 88 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 88 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

89. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Intentional Infliction of Emotional Distress claim that has since been

dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 89 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 89 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

90. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Intentional Infliction of Emotional Distress claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 90 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 90 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

91. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Intentional Infliction of Emotional Distress claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 91 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 91 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

92. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Intentional Infliction of Emotional Distress claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 92

to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 92 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

93. This paragraph contains legal arguments that do not require a response, including legal argument regarding an Intentional Infliction of Emotional Distress claim that has since been dismissed. To the extent a response is required, Defendant denies the allegations of paragraph 93 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 93 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

FOR A FIFTH CAUSE OF ACTION AGAINST DEFENDANTS
(Negligent Hiring – Defendant Limestone)

94. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 93, inclusive, of this Complaint, as though fully set forth herein.

95. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 95, and on that basis denies each and every allegation.

96. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 96, and on that basis denies each and every allegation.

97. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 97, and on that basis denies each and every allegation.

98. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 98, and on that basis denies each and every allegation.

99. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 99, and on that basis denies each and every allegation.

FOR A SIXTH CAUSE OF ACTION AGAINST DEFENDANTS
(Negligent Supervision – Defendant Limestone)

100. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 99, inclusive, of this Complaint, as though fully set forth herein.

101. Defendant denies the allegations in paragraph 101 on the basis that typographical errors in the paragraph obscure its plain meaning and do not permit a response.

102. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 102, and on that basis denies each and every allegation.

103. No response is required because Defendant is not named in Plaintiffs' Negligent

Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 103, and on that basis denies each and every allegation.

104. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 104, and on that basis denies each and every allegation.

105. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 105, and on that basis denies each and every allegation.

106. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 106, and on that basis denies each and every allegation.

107. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 107, and on that basis denies each and every allegation.

108. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 108, and on

that basis denies each and every allegation.

FOR A SEVENTH CAUSE OF ACTION AGAINST DEFENDANTS
(Negligent Monitoring – Defendant Pornhub and Defendant xHamster)

109. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 108, inclusive, of this Complaint, as though fully set forth herein.

110. Defendant admits and alleges that it operates and maintains pornhub.com, and that the pornhub.com website contains sexually explicit material. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations within paragraph 110, and on that basis denies each and every remaining allegation.

111. Defendant admits that it has received communications from third parties requesting that material be taken down from the pornhub.com website for various reasons. To the extent that the allegations of paragraph 111 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

112. Paragraph 112 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 112 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 112 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

113. Paragraph 113 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 113 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 113 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form

a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

114. Paragraph 114 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 114 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 114 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

115. Paragraph 115 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 115 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 115 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

FOR A EIGHTH CAUSE OF ACTION AGAINST DEFENDANTS
(False Light – Defendant Pornhub and Defendant xHamster)

116. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 115, inclusive, of this Complaint, as though fully set forth herein.

117. Defendant admits that it operates and maintains pornhub.com, and that the pornhub.com contains sexually explicit material. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 117, and on that basis denies each and every remaining allegation.

118. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 118, including because the Complaint does not identify the “videos” or the “Plaintiffs” referenced therein, and on that basis denies each and every allegation.

119. Typographical errors within paragraph 119 obscure its plain meaning and do not

permit a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 119, including because the Complaint does not identify the “videos” or the “Plaintiffs” referenced therein, and on that basis denies each and every allegation.

120. Typographical errors within paragraph 120 obscure its plain meaning and do not permit a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 120, including because the Complaint does not identify the “videos” or the “Plaintiffs” referenced therein, and on that basis denies each and every allegation.

121. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 121, including because the Complaint does not identify the “videos” or the “Plaintiffs” referenced therein, and on that basis denies each and every allegation.

122. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 122, including because the Complaint does not identify the “videos” or the “girls” referenced therein, and on that basis denies each and every allegation.

123. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 123 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 123 pertain to persons or entities other than Defendant, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

FOR A NINTH CAUSE OF ACTION AGAINST THE DEFENDANTS
(Civil Conspiracy- against Defendant Murphy and Defendant Pornhub)

124. Defendant re-alleges and incorporates herein by reference its response to

paragraphs 1 through 123, inclusive, of this Complaint, as though fully set forth herein.

125. Defendant denies the allegations of paragraph 125.

126. Defendant denies the allegations of paragraph 126.

127. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 127.

FOR A TENTH CAUSE OF ACTION AGAINST THE DEFENDANTS
(Civil Conspiracy- against Defendant Murphy and Defendant xHamster)

128. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 127, inclusive, of this Complaint, as though fully set forth herein.

129. No response is required because Defendant is not named in Plaintiffs' second Civil Conspiracy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 129, and on that basis denies each and every allegation.

130. No response is required because Defendant is not named in Plaintiffs' second Civil Conspiracy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 130, and on that basis denies each and every allegation.

131. No response is required because Defendant is not named in Plaintiffs' second Civil Conspiracy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 131, and on that basis denies each and every allegation.

FOR A ELEVENTH CAUSE OF ACTION AGAINST THE DEFENDANTS
(CONDUCTING THE AFFAIRS OF THE ENTERPRISE THROUGH A PATTERN OF
RACKETEERING ACTIVITY - 18 U.S.C. § 1962(c) and 1964(c) against Defendant
Murphy and Defendant xHamster)

132. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 131, inclusive, of this Complaint, as though fully set forth herein.

THE ENTERPRISE

133. Paragraph 133 contains legal arguments that do not require a response.

134. Paragraph 134 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 134.

135. Paragraph 135 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 135.

136. Paragraph 136 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 136.

137. Paragraph 137 contains legal arguments that do not require a response. To the extent a response is required, the allegations within paragraph 137 are too vague to permit a response, including that the referenced “racketeering activity” and “actions” are undefined and vague, the “Enterprise” is undefined and vague, and no specific allegations of “Wire Fraud” are included. Defendant denies each and every allegation on that basis.

138. Paragraph 138 contains legal arguments that do not require a response. To the extent a response is required, the allegations within paragraph 138 are too vague to permit a

response, including that the referenced “racketeering acts” are undefined and vague, the “Enterprise” is undefined and vague, and no specific “predicate acts” are identified. Defendant denies each and every allegation on that basis.

THE PATTERN OF RACKETEERING

139. Paragraph 139 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 139.

140. Paragraph 140 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 140.

141. Paragraph 141 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 141.

142. Paragraph 142 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 142.

143. Paragraph 143 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 143.

144. Paragraph 144 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 144.

145. Paragraph 145 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 145.

146. Defendant admits and alleges that the pornhub.com website is available to users outside the United States. Defendant denies each and every remaining allegation in paragraph 146.

147. Defendant denies each and every factual allegation in paragraph 147.

148. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 148, including because Plaintiffs nowhere identify the referenced “lewd, illegal, sexual content” and on that basis Defendant denies each and every allegation.

149. Defendant denies each and every factual allegation in paragraph 149.

150. Paragraph 150 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 150.

151. Paragraph 151 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 151.

152. Paragraph 152 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 152.

153. Paragraph 153 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 153 including subparagraphs 1 through 3.

PRAYER FOR RELIEF

The remainder of Plaintiffs’ Fourth Amended Complaint constitutes Plaintiffs’ request for relief to which no response is required. To the extent a response is required, Defendant denies that Plaintiffs are entitled to the relief sought. All allegations that have not been specifically admitted or alleged are hereby denied.

AFFIRMATIVE DEFENSES

Defendant does not presently know all of the facts and circumstances respecting Plaintiffs’ claims, and reserves the right to amend this Answer. Subject to the foregoing, and without waiving

or excusing Plaintiffs' burden of proof, or admitting that any of the following are in fact defenses upon which Defendant has any burden of proof as opposed to denials of matters as to which Plaintiffs have the burden of proof, or that Defendant has any burden of proof at all, Defendant hereby asserts the following affirmative defenses.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

1. The Complaint fails to state facts sufficient to constitute a claim for relief.

SECOND AFFIRMATIVE DEFENSE

(Superseding/Intervening Acts of Others)

2. Plaintiffs' claims are barred in whole or in part because the incidents alleged and all damages complained of, if any, were caused by the superseding and/or intervening acts of parties other than Defendant, and over whom Defendant has no right of control.

THIRD AFFIRMATIVE DEFENSE

(Proportionate Responsibility, Equitable Allocation, Recoupment, Set-off, and/or Comparative Fault)

3. Plaintiffs' claims are barred in whole or in part because any damage, loss, or liability alleged by Plaintiffs must be reduced, diminished, and/or barred in proportion to the wrongful or negligent conduct of persons or entities other than Defendant, including those who actually created the videos at issue and uploaded them to a number of online websites.

FOURTH AFFIRMATIVE DEFENSE

(Statutory Immunity)

4. Defendant is immune from liability for the actions as alleged by Plaintiffs pursuant to Section 230 of the Communications Decency Act, 47 U.S.C. § 230.

FIFTH AFFIRMATIVE DEFENSE

(Lack of Jurisdiction)

5. This Court lacks personal jurisdiction over Defendant.

SIXTH AFFIRMATIVE DEFENSE

(Lack of Standing)

6. Plaintiffs lack standing to assert claims against Defendant for the creation and posting of the videos at issue in this case.

SEVENTH AFFIRMATIVE DEFENSE

(Reservation of Additional Defenses)

7. Defendant reserves the right to assert additional defenses that become apparent during discovery or otherwise.

DEFENDANT'S PRAYER FOR RELIEF

WHEREFORE, Defendant requests relief on Plaintiffs' Complaint as follows:

1. That Plaintiffs' Complaint be dismissed with prejudice, judgment entered in favor of Defendant, and Plaintiffs take nothing by their Complaint;
2. That Defendant be awarded full costs incurred herein;
3. That Defendant be awarded reasonable attorneys' fees; and
4. That this Court award such other and further relief as it deems just and equitable.

[Signature block on following page]

DATED: June 30, 2021

Respectfully submitted,

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